

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)

**CERTIFICATION OF C. BRETT VAUGHN IN SUPPORT OF
PLAINTIFFS' REPLY BRIEF IN SUPPORT OF DAUBERT MOTION TO EXCLUDE
TESTIMONY OF DEFENSE EXPERT MICHAEL B. BOTTORFF, PHARM. D.**

C. BRETT VAUGHN, hereby certifies as follows:

1. I am an attorney at law within the State of Kansas with the Hollis Law Firm, and serve on the Plaintiff's Executive Committee. I am fully familiar with the facts and circumstances of these actions. I make this Certification in support of Plaintiffs' motion to exclude the testimony of Michael B. Bottorff, Pharm. D.

2. Attached hereto as **Exhibit H** is a true and accurate copy of European Medicines Agency (EMA), *Application of the Principles of the ICH M7 Guideline to Calculation of Compound-Specific Acceptable Intakes: Step B*, Comm. for Human Medicinal Products (2015).

3. Attached hereto as **Exhibit I** is a true and accurate copy of U.S. Environmental Protection Agency (EPA), *Recommended Use of Body Weight^{3/4} as the Default Method in Derivation of the Oral Reference Dose*, Office of the Science Advisor (2011).

HOLLIS LAW FIRM
Attorneys for Plaintiffs

Dated: January 6, 2022

By: /s/ C. Brett Vaughn
C. Brett Vaughn RN, BSN, JD